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October 2, 2024

Hon. Jesse M. Furman
United States District Court
40 Centre Street, Room 2202
New York, NY 10007

Re: *ChemImage Corp. v. Johnson & Johnson et al.*, No. 1:24-CV-2646 (JMF)
Letter Motion For Leave to Seal

Dear Judge Furman:

On behalf of Plaintiff ChemImage Corporation (“ChemImage”), we write pursuant to Federal Rule of Civil Procedure 5.2(d), this Court’s Standing Order 19-MC-583, and Rule 7.C of the Court’s Individual Rules and Practices in Civil Cases to respectfully seek leave to seal (i) Plaintiff ChemImage’s Letter Reply to Defendants’ Motion for a Protective Order, ECF No. 84, and (ii) each of the twelve exhibits attached thereto. A redacted, public version of ChemImage’s letter reply is being filed contemporaneously herewith.

On September 27, Defendants filed a Letter Motion for a Protective Order to preclude the deposition of Ashley McEvoy. See ECF No. 84. ChemImage’s reply quotes from and attaches twelve confidential documents produced by Defendants in the course of this litigation. These documents are required to be filed under seal pursuant to the parties’ Protective Order, ECF No. 56. ChemImage conferred with Defendants on October 2, 2024 as required by Rule 7.C of the Court’s Individual Rules and Practices and Defendants requested that ChemImage file the exhibits under seal and redact any quotes from ChemImage’s public filing.

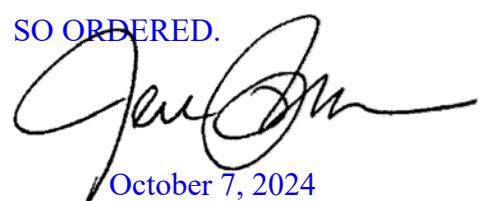
We thank the Court for its consideration.

Respectfully submitted,
Application GRANTED temporarily. The Court will decide whether to maintain the document under seal when resolving the underlying motion. The Clerk of Court is directed to terminate ECF No. 85.

/s/ Courtney C. Whang

Courtney C. Whang

SO ORDERED.



October 7, 2024